

George D. Niespolo (SBN 72107)
Allegra A. Jones (SBN 236518)
DUANE MORRIS LLP
Spear Tower
One Market Plaza, Suite 2200
San Francisco, CA 94105-1127
Telephone: 415.957.3000
Facsimile: 415.957.3001
E-mail: gdniespolo@duanemorris.com
aajones@duanemorris.com

Attorneys for Defendant
MONA DAGGETT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

LANE BAULDRY,

Plaintiff,

v.

TOWN OF DANVILLE, COUNTY OF CONTRA
COSTA, CITY OF PIEDMONT, Government
Entities, MONA DAGGETT, CHRISTOPHER
BUTLER, DEPUTY STEPHEN TANABE,
DEPUTY TOM HENDERSON, SERGEANT
ANDY WELLS and DOES 1 to 50, inclusive,

Defendants.

Case No.: 3:12-cv-03943-SI

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
FURTHER EXTENSION OF TIME
FOR DEFENDANT MONA DAGGETT
TO RESPOND TO PLAINTIFF'S
SECOND AMENDED COMPLAINT**

Plaintiff Lane Bauldry ("Plaintiff") and Defendant Mona Daggett ("Daggett") (collectively the "Stipulating Parties") hereby stipulate as follows:

WHEREAS, pursuant to the Stipulation and Order regarding Amendment of Complaint and Responses Thereto dated December 17, 2012 ("Stipulation and Order"), Plaintiff filed his second amended complaint, entitled "Amended Complaint for Damages for Violations of Civil Rights and Other Wrongs" (hereinafter "Second Amended Complaint"), on January 4, 2013;

WHEREAS, pursuant to the Stipulation and Order, and a further stipulation and order of the Court dated January 28, 2013, Daggett's current deadline for responding to the Second Amended Complaint is February 8, 2013;

1 WHEREAS, since Plaintiff filed Second Amended Complaint, the Stipulating Parties have
2 continued to discuss this action and have agreed to extend the deadline for Daggett to answer or
3 otherwise respond to the Second Amended Complaint to, and including, February 22, 2013;

4 WHEREAS, an extension of time for responding to the Second Amended Complaint is
5 supported by good cause as it will not prejudice any party to this action and does not interfere with
6 any court-mandated deadlines;

7 THEREFORE, the Stipulating Parties request that the Court extend the deadline for Daggett
8 to respond to Plaintiff's Second Amended Complaint from February 8, 2013 to, and including,
9 February 22, 2013.

10 **IT IS SO STIPULATED.**

11 Dated: February 8, 2013

DUANE MORRIS LLP

12
13 By: /s/ Allegra A. Jones

14 Allegra A. Jones
15 Attorneys for Defendant
MONA DAGGETT

16 Dated: February 8, 2013

THE HALEY LAW OFFICES

17
18 By: /s/ Matthew Haley

19 Matthew Haley
20 Attorneys for Plaintiff
LANE BAULDRY

21 ATTESTATION: Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the
22 filing of this document has been obtained from each of the other signatories thereto.

23 **ORDER**

24
25 **IT IS SO ORDERED.**

26
27 Dated: February __12, 2013



JUDGE OF THE U.S. DISTRICT COURT